

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL 2327 JOSEPH R. GOODWIN U.S. DISTRICT JUDGE
THIS DOCUMENT RELATES TO ALL CASES	

CROSS NOTICE OF VIDEO DEPOSITION OF TIM SCHMID

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that the deposition of TIM SCHMID will be taken jointly in connection with *In Re: Ethicon, Inc., Pelvic Repair System Products Liability Litigation*, MDL No. 2327, United States District Court, Southern District of West Virginia at Charleston and *Carol Cavness v. Kowalczyk, et al.*, 95th Judicial District, Dallas County, Texas, Cause No. DC-14-04220, upon oral examination at the offices of Riker, Danzig Scherer Hyland & Perretti, LLP, Headquarters Plaza One Speedwell Avenue, Morristown, New Jersey, 07962-1981, on July 31, 2015, at 8:30 a.m. EST.

PLEASE TAKE FURTHER NOTICE that in accordance with Rule 30 of the Federal Rules of Civil Procedure, the procedures set forth *In Re: Ethicon Inc., Pelvic Repair System Products Liability Litigation*, MDL No. 2327, Defendants Ethicon Inc. and Johnson & Johnson hereby cross-notice this deposition for any and all purposes permitted by the Federal Rules of Civil Procedure, the rules of the MDL Court, and any other state or local rules that apply to this action. Defendants Ethicon, Inc. and Johnson & Johnson further state that this

deposition shall be conducted in accordance with and subject to the Protective Orders entered in
In Re: Ethicon Inc., Pelvic Repair System Products Liability Litigation, MDL No. 2327.

This deposition will be taken before a person authorized by law to administer
oaths and video-taped.

Dated: July 28 , 2015.

Respectfully submitted,

/s/Christy D. Jones
Christy D. Jones
BUTLER SNOW LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4523
Christy.jones@butlersnow.com

/s/ David B. Thomas
David B. Thomas (W.Va. Bar #3731)
Thomas Combs & Spann PLLC
300 Summers Street
Suite 1380 (25301)
P.O. Box 3824
Charleston, WV 25338
(304) 414-1807
dthomas@tcspllc.com

COUNSEL FOR DEFENDANTS
ETHICON, INC. AND
JOHNSON & JOHNSON

CERTIFICATE OF SERVICE

I hereby certify that on July 28, 2015, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to CM/ECF participants registered to receive service in this MDL.

/Christy D. Jones
Christy D. Jones